

Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ALIGN TECHNOLOGY, INC.,

Plaintiff,

v.

CLEARCORRECT OPERATING, LLC,
CLEARCORRECT HOLDINGS, INC., &
INSTITUT STRAUMANN AG,

Defendants.

Case No. 6:24-cv-00187-ADA-DTG

CLEARCORRECT OPERATING, LLC,
CLEARCORRECT HOLDINGS, INC., &
STRAUMANN USA, LLC,

Counterclaim-Plaintiffs,

v.

ALIGN TECHNOLOGY, INC.,

Counterclaim-Defendant.

**DEFENDANTS' AND COUNTERCLAIM-PLAINTIFFS' FIRST AMENDED
INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(A)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendants and Counterclaim-Plaintiffs ClearCorrect Operating, LLC and ClearCorrect Holdings, Inc., Counterclaim-Plaintiff Straumann USA, LLC, and Defendant Institut Straumann AG (collectively, "ClearCorrect") make the following initial disclosures to Plaintiff and Counterclaim-Defendant Align Technology, Inc. ("Align").

A. GENERAL STATEMENT

Based on the information reasonably available to ClearCorrect at this time, ClearCorrect provides these disclosures subject to and without waiving any applicable privilege, doctrine, or right, including without limitation the attorney-client privilege, the work product doctrine, and all other rights and privileges recognized under the laws of the United States, the State of Texas, and all relevant jurisdictions. By these disclosures, ClearCorrect does not concede the relevance or admissibility of any particular information. ClearCorrect reserves the right to modify, amend, retract, and/or supplement these disclosures and to present additional evidence to support its claims and defenses with any filing or during any proceeding in this action, including trial.

B. DISCLOSURES

1. Disclosure of Individuals (Fed. R. Civ. P. 26(a)(1)(A)(i))

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), and subject to the foregoing General Statement, ClearCorrect discloses the following individuals that are likely to have discoverable information, along with the subjects of that information, that ClearCorrect may use to support its claims, defenses, or counterclaims (unless the use would be solely for impeachment).

PERSON	Connection to Case	SUBJECT MATTER
Cameron Pugh [Contact through counsel of record for Defendants and Counterclaim Plaintiffs: WilmerHale LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6000]	Straumann USA, LLC, Regional Sales Director	<ul style="list-style-type: none">• ClearCorrect's sales of clear aligners• ClearCorrect's sales practices, sales plans, and marketing• ClearCorrect's customers for clear aligners• ClearCorrect's competitors in the sale of clear aligners and the distinguishing characteristics of ClearCorrect's products• ClearCorrect's negotiations with

<p>Artem Borovinskikh</p> <p>[Contact through counsel of record for Defendants and Counterclaim Plaintiffs:</p> <p>WilmerHale LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6000]</p>	<p>Institut Straumann AG, Global Head of Orthodontic Software</p>	<ul style="list-style-type: none"> • Design, development, features, and function of Cut & Stage and ClearPilot
<p>Philippe Chavanne</p> <p>[Contact through counsel of record for Defendants and Counterclaim Plaintiffs:</p> <p>WilmerHale LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6000]</p>	<p>Institut Straumann AG, Global Head of Orthodontic Research and Development</p>	<ul style="list-style-type: none"> • ClearCorrect® aligner features • ClearCorrect's stain resistance testing of aligners
<p>Ray Stewart</p> <p>[Contact through counsel of record for Defendants and Counterclaim Plaintiffs:</p> <p>WilmerHale LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6000]</p>	<p>Bay Materials, LLC Founder and Former General Manager</p>	<ul style="list-style-type: none"> • Bay Materials's corporate history, research and development, products, and innovations • Design, development, structure, and function of Zendura FLX or FLX and ClearQuartz
<p>Jason Coss</p> <p>[Contract through counsel of record for Defendants and Counterclaim Plaintiffs:</p> <p>WilmerHale LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6000]</p>	<p>Straumann USA, LLC Vice President and Head of Dental Sales for North America</p>	<ul style="list-style-type: none"> • ClearCorrect's marketing and sales of intraoral scanners including Virtuo Vivo • Information regarding the market for intraoral scanners and competitive products
<p>Claude Sasseville</p>	<p>Dental Wings, Inc. Head of Software Development</p>	<ul style="list-style-type: none"> • Design, development, structure, and function of Virtuo Vivo